

# **Exhibit E**



Aaron Wright &lt;aaron@holcombward.com&gt;

**Re: RE: Deposition on September 27, 2024**

1 message

**Floyd Landis** <floyd@floydsofleadville.com>

Mon, Sep 23, 2024 at 4:01 PM

To: "Daniel J. Vedra" <dan@vedralaw.com>, Paul Rachmuth <Paul@paresq.com>, "holly@holcombward.com" <holly@holcombward.com>, "bryan.ward@holcombward.com" <bryan.ward@holcombward.com>, "aaron@holcombward.com" <aaron@holcombward.com>, "Barrie Clapham(L&S)" <barrie.clapham@londonandscottishinvestments.com>, Mark Leonard <markleonard1121@gmail.com>, Greg Hurley <greghurley99@gmail.com>  
Cc: Bryan McKenna <bam@mckennalegal.nyc>

And I now quote Mickey Mouse from below:

"Your allegations are both wrong and obnoxious. To accuse someone of lying about their dying father just because they went out to dinner is ridiculous. And to try to paint me with negative inferences is similarly ridiculous. Rather than keeping trying to spot a liar among the defendants and their counsels, I suggest you examine the proven liar that is your client."

Speaking of proven liars please see the below:

<https://caselaw.findlaw.com/court/ny-supreme-court-appellate-division/115950863.html>

This man announced himself as counsel for defendants, or at the very least everyone to believe that he was, depending on the deposition, at multiple depositions while Mickey Mouse was fully aware of it.

I'll be filing a bar complaint today against Mickey Mouse with the NY bar association today.

----- Original Message -----

On 9/23/24 10:35 AM, Daniel J. Vedra wrote:

Paul:

I don't have any record of that. You are going out of town on Thursday evening during Floyd Landis's deposition?

Mark Leonard celebrated his birthday on the same day you told me he was holding vigil at his father's death bed. This is after he told the Court he was the CEO after you told the Court he was a salesman. After learning that Mark Leonard has been lying about his dad being sick, a lie that you have repeated to me, I've lost all trust in you.

Please confirm that you are not Greg Hurley's lawyer.

Dan

**VEDRA LAW LLC**

1444 Blake Street

Denver, CO 80202

Office: (303) 937-6540

Direct: (720) 295-9391

Fax: (303) 937-6547

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**From:** Paul Rachmuth <[Paul@paresq.com](mailto:Paul@paresq.com)>

**Sent:** Monday, September 23, 2024 9:51 AM

**To:** 'Daniel J. Vedra' <[dan@vedralaw.com](mailto:dan@vedralaw.com)>

**Cc:** 'Bryan Ward' <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>; 'Bryan McKenna' <[bam@mckennalegal.nyc](mailto:bam@mckennalegal.nyc)>; 'Holly Cole' <[holly@holcombward.com](mailto:holly@holcombward.com)>; 'Aaron Wright' <[aaron@holcombward.com](mailto:aaron@holcombward.com)>

**Subject:** RE: Deposition on September 27, 2024

Daniel,

I had previously stated we were not available on Friday when you wanted to schedule Barrie Clapham's deposition for that date. I will be out of town – Las Vegas - from Thursday evening until Sunday evening.

PAR

*Paul A. Rachmuth*

Attorney at Law

265 Sunrise Highway, Ste. 1515

Rockville Centre, New York 11570

Telephone: (516) 330-0170

Facsimile: (516) 543-0516

Email: [paul@paresq.com](mailto:paul@paresq.com)

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**From:** Daniel J. Vedra <[dan@vedralaw.com](mailto:dan@vedralaw.com)>

**Sent:** Monday, September 23, 2024 11:00 AM

**To:** Paul Rachmuth <[Paul@paresq.com](mailto:Paul@paresq.com)>

**Cc:** Bryan Ward <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>; Bryan McKenna <[bam@mckennalegal.nyc](mailto:bam@mckennalegal.nyc)>; Holly Cole

<holly@holcombward.com>; Aaron Wright <aaron@holcombward.com>

**Subject:** RE: Deposition on September 27, 2024

Paul:

I notified you of this deposition on September 11, 2024. It was not until eight days later, after I served Mr. Hurley, and after I reminded all of the parties in the case, that you notified us that you are unavailable. We have had to reschedule every single deposition in this case. For your clients, we have had to reschedule them multiple times. Your clients have missed nearly every single deadline in this case: initial disclosures, requests for production, answer, requests for admission, scheduling conferences, court ordered deadlines to produce documents, the list goes on.

We are skeptical of the need to reschedule this deposition, particularly in light of the fact that Mr. Hurley is business partners with Mr. Clapham and one of the largest shareholders in another company (Stewart Enterprises Holdings Inc.) that was taken over in similar fashion that Redemption Holdings attempted to take over FoL and for which you are the general counsel. And we are especially skeptical that this deposition needs to be postponed based upon the text messages exchanged between Mr. Hurley and Mr. Clapham wherein Mr. Hurley and Mr. Clapham discussed using Mark Leonard's cousin to surreptitiously draft pleadings for Mr. Leonard. It seems like another game that Mr. Clapham and Mr. Hurley are playing to delay this case.

Dan



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**From:** Paul Rachmuth <Paul@paresq.com>

**Sent:** Thursday, September 19, 2024 7:04 PM

**To:** 'Daniel J. Vedra' <dan@vedralaw.com>

**Cc:** 'Bryan Ward' <bryan.ward@holcombward.com>; 'Bryan McKenna' <bam@mckennalegal.nyc>; 'Holly Cole' <holly@holcombward.com>; 'Aaron Wright' <aaron@holcombward.com>

**Subject:** RE: Deposition on September 27, 2024

Daniel,

I am not available on Friday, September 27, 2024.

PAR

*Paul A. Rachmuth*

Attorney at Law

265 Sunrise Highway, Ste. 1515

Rockville Centre, New York 11570

Telephone: (516) 330-0170

Facsimile: (516) 543-0516

Email: [paul@paresq.com](mailto:paul@paresq.com)

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**From:** Daniel Vedra <[dan@vedralaw.com](mailto:dan@vedralaw.com)>  
**Sent:** Thursday, September 19, 2024 7:26 PM  
**To:** [greghurley99@gmail.com](mailto:greghurley99@gmail.com); [slickrunnr1@aol.com](mailto:slickrunnr1@aol.com)  
**Cc:** Bryan Ward <[bryan.ward@holcombward.com](mailto:bryan.ward@holcombward.com)>; Bryan McKenna <[bam@mckennalegal.nyc](mailto:bam@mckennalegal.nyc)>; Holly Cole <[holly@holcombward.com](mailto:holly@holcombward.com)>; Aaron Wright <[aaron@holcombward.com](mailto:aaron@holcombward.com)>; Paul Rachmuth <[Paul@paresq.com](mailto:Paul@paresq.com)>  
**Subject:** Deposition on September 27, 2024

Dear Mr. Hurley:

Please find attached correspondence concerning your deposition on September 27, 2024.

Regards,

Dan Vedra



1444 Blake Street

Denver, CO 80202

Office: (303) 937-6540

10/9/24, 8:19 PM

Direct: (720) 295-9391

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